



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** DEC 19 2018

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Derichebourg Recycling USA, Houston, Texas

**FROM:** Scott Connolly, Environmental Engineer  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Derichebourg Recycling USA

**Facility Location:** 1 Wharf Street, Houston, Texas 77012

**Date of Inspection:** November 8, 2018

**EPA Inspectors:**

1. Scott Connolly, Environmental Engineer
2. Natalie Topinka, Environmental Scientist

**Other Attendees**

1. Cody Lacy, Operations Manager, Derichebourg Recycling USA
2. Sandy Jimenez, Regional Environmental and Health Manager, Derichebourg Recycling USA

**Contact Email Address:** [sandy.jimenez@derichebourg.com](mailto:sandy.jimenez@derichebourg.com)

**Purpose of Inspection:** To determine compliance with the Clean Air Act

**Facility Type:** Metal shredding and recycling yard

**Regulations Central to Inspection:** 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reduction

**Arrival Time:** 9:13 am

**Departure Time:** 9:35 am

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from inspection attendees unless otherwise noted.

**Process Description:**

The facility purchases and processes scrap metal received by truck from feeder yards, industrial clients and from the general public. Scrap inspectors check the incoming metal items for non-conforming material during unloading into scrap piles, depending on material and available space. Cars are processed, by removing fluids, batteries, mercury switches, but not refrigerants. Then the shredder processes the piles postconsumer and industrial ferrous scrap, including vehicles. Cranes load scrap metal onto a conveyor, which feeds the metal into the hammermill shredder. Vehicles are feed into a top loading pre-shredder that punctures the vehicles, reduces their volume and deposits them on the hammermill shredder feed conveyor. The hammermill is equipped with an automatic water injection system, which sprays water into the shredder to reduce dust and to cool the metal. Shredded metal exits the shredder and is fed through a magnetic separator, which separates non-magnetics from ferrous metal. An eddy current separator removes nonferrous metals from non-metallic fluff that is sent to a landfill. Air emissions from the hammermill shredder is controlled by two in series cyclones, dedusting baghouse and stack.

**Staff Interview:** Facility staff stated suppliers sign a form certifying that refrigerants are removed prior to delivery at the facility. The facility keeps these forms on file for regular customers. Supplies also sign a scale ticket that certifies proper recovery. The facility operates a vehicle processing station but does not recover refrigerants prior to shredding. The facility operates a 6000-horsepower engine to power its hammermill shredder and processes about 40% vehicles. Most of the scrap supplied to the facility arrives from feeder yards, including Derichebourg facilities.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

Large numbers of cars processed at the facility were located in the shredder scrap pile. Single tow vehicles were observed at the processing station or in the staging area. The shredder was not operating at the time of the inspection.

**Photos and/or Videos:** were taken during the inspection.

A photo log is contained in Appendix A.

**Field Measurements:** were not taken during this inspection.

### CLOSING CONFERENCE


**Requested documents:**

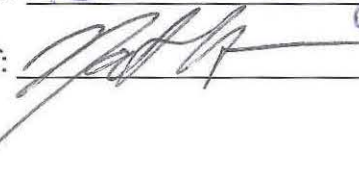
- Scale ticket (1 copy obtained)

**Compliance Assistance:** The facility was informed that the vehicles accepted by the facility likely still contain refrigerant and that it was unlikely that recovery of those refrigerants was occurring.

**Concerns:** The facility is not recovering refrigerants unprocessed cars and is shredding the cars on site.

### SIGNATURES

Report Author:  Date: 12/14/18

Section Chief:  Date: 12/19/18

**Facility Name:** Derichebourg Recycling USA  
**Facility Location:** 1 Wharf Street, Houston, Texas  
**Date of Inspection:** November 8, 2018

**APPENDICES AND ATTACHMENTS**

*I.*      Appendix A: Digital Image Log

**Facility Name:** Derichebourg Recycling USA  
**Facility Location:** 1 Wharf Street, Houston, Texas  
**Date of Inspection:** November 8, 2018

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Natalie Topinka	<b>2. Date of Inspection:</b> November 8, 2018
<b>3. Company/Facility Name:</b> Derichebourg Recycling USA	<b>4. Street Address, City, State:</b> 1 Wharf Street, Houston, Texas
<b>5. Number of Images:</b> 9	<b>6. Archival Record Location:</b> Photos are contained on the attached CD labeled "Deichebourg Recycling USA 1 Wharf Street, Houston, TX Inspection Photos"

Image Number	File Name	Date and Time	Latitude and Longitude	Description of Image
1	PB080041.JPG	11/8/2018 12:10	29.729622, -95.27872	Derichebourg Wharf St vehicle processing station
2	PB080042.JPG	11/8/2018 12:10	29.729392, -95.278765	Derichebourg Wharf St vehicle processing station
3	PB080043.JPG	11/8/2018 12:10	29.729397, -95.278777	Derichebourg Wharf St sign and shredder system
4	PB080044.JPG	11/8/2018 12:12	29.728927, -95.278178	Vehicle and scrap metal pile and
5	PB080045.JPG	11/8/2018 12:14	29.72874, -95.27743	Scrap Vehicle pile and pre-shredder
6	PB080046.JPG	11/8/2018 12:15	29.728611, -95.277222	Derichebourg Wharf St Shredder infeed conveyor, shredder enclosure, cyclones and baghouse
7	PB080047.JPG	11/8/2018 12:18	29.72954, -95.277585	CBI - Derichebourg Wharf St Shredder collection system
8	PB080048.JPG	11/8/2018 12:19	29.729448, -95.277672	CBI - Derichebourg Wharf St undermill oscillator outfeed conveyor equipped with rubber flaps
9	PB080049.JPG	11/8/2018 12:20	29.729663, -95.277508	Derichebourg Wharf St Baghouse, cyclones, zbox and stack

